

Brooks, Laura

From: Kimmel.Larry@epamail.epa.gov
Sent: Wednesday, July 27, 2005 12:49 PM
To: Serreze, Susan
Cc: aguilar.mark@epamail.epa.gov; Ainscough, Harlen; tbechtel@greystone.us; Blackburn.Robyn@epamail.epa.gov; Brooks, Laura; Castaneda, Norma; Garcia.Sam@epamail.epa.gov; David Kruchek; ross.lorraine@epamail.epa.gov; Spreng, Carl; Wiemelt, Karen; Rampe, John; Shelton, Dave
Subject: Draft Nature and Extent of Soil Contamination Summary Report (resent w/attachment)



Draft N&E_Soil
Comments.doc

Sorry, apparently I didn't have access to send the e-mail attachment from Mountain View the first time. I'm resending via EPA webmail from home. Hopefully this time it works!

Larry

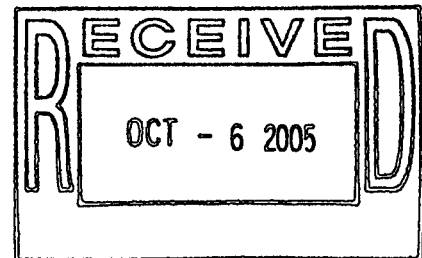
-----Forwarded by Larry Kimmel/EPR/R8/USEPA/US on 07/27/2005 12:41PM -----

To: Susan.Serreze@rfets.gov
From: Larry Kimmel/EPR/R8/USEPA/US
Date: 07/27/2005 11:23AM
cc: aguilar.mark@epa.gov, harlen.ainscough@state.co.us, tbechtel@greystone.us, Robyn Blackburn/EPR/R8/USEPA/US@EPA, Laura.Brooks@rfets.gov, Norma.Castaneda@rf.doe.gov, Sam Garcia/EPR/R8/USEPA/US@EPA, David.Kruchek@state.co.us, ross.lorraine@epa.gov, carl.spreng@state.co.us, Karen.Wiemelt@rfets.gov, John.Rampe@rf.doe.gov, Dave.Shelton@rfets.gov <mailto:Dave.Shelton@rfets.gov>

Subject: Draft Nature and Extent of Soil Contamination Summary Report

Susan,
Attached is a copy of EPA's comments on the subject document.

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1/2

**EPA Comments for the Summary Report
Draft Nature and Extent of Soil Contamination
July 2005**

July 27, 2005

General Comments

EPA realizes that this document is a section of a much larger report, specifically, Section 3.0 of the Remedial Investigation/Feasibility Study (RI/FS). We assume that the introductory sections of the RI/FS will adequately present the framework or context in which this document is prepared (i.e. RFCA, CRA, Accelerated Actions, WRW ALs, WRW PRGs, ESLs, process knowledge evaluations, etc.).

The Draft Nature and Extent of Soil introduces several topics, such as PRGs, ALs, and other reports and references not previously discussed. Readability of each section would be greatly enhanced if a short summary or description is presented prior to referencing the document. For example, throughout Sections 5.2 and 5.3, the text references the ChemRisk reports and Historical Knowledge of Metals White Paper. A short description of these two reports should be included in the introductory paragraphs of Section 5.0.

Specific Comments

1. **Section 3.0, Data Source, page 3.** This section discusses the processes used to extract and reduce data. Based on the information presented, approximately 450,000 records were eliminated. Please provide a more thorough discussion as to the reasons for elimination. Furthermore, please clarify whether the NLR samples were removed prior to or after the data extraction and reduction process that generated 850,000 records.
2. **Section 5.2, Section 5.2.1, page 9.** The RFCA Action Level is first mentioned in this section; however, it is not previously presented or discussed in this Nature and Extent document. This specific comment illustrates the need for an introductory section in the RI/FS that discusses the RFCA framework for better readability and context.